

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re Application of Holland Middle East Trading Ltd. to Obtain Discovery for Use in a Suit Pending in the Haarlem District Court of the Kingdom of the Netherlands))))) _____)	Case No. 08-CV-1344 Hon. Ruben Castillo Magistrate Judge Martin C. Ashman
--	---------------------------------	---

NOTICE OF MOTION

TO:

Peter V. Baugher & Lindsay Wilson Gowin
Schopf & Weiss LLP
One South Wacker Drive, 28th Floor
Chicago, IL 60606

PLEASE TAKE NOTICE that at 9:45 a.m. on Wednesday, June 11, 2008, or as soon thereafter as counsel may be heard, the undersigned will appear before the Honorable Judge Ruben Castillo, United States District Judge, in the courtroom usually occupied by him in the Dirksen Federal Courthouse, Room 2141, 219 South Dearborn Street, Chicago, Illinois 60604, or in his absence, before such judge who may be sitting in his place and stead, and shall then and there present Respondents' Motion to Obtain Reciprocal Discovery, a copy of which accompanies this notice and is hereby served on you.

By: /s/ Amy A. Pines

Scott A. Meyers
Kurt Stitcher
David W. Porteous
Amy A. Pines
LEVENFELD PEARLSTEIN, LLC
2 N. LaSalle St., Suite 1300
Chicago, Illinois 60602
Phone: (312) 346-8380
Facsimile: (312) 346-8434

*Attorneys for Respondents Lee Hillman,
Mark Minter, and Power Plate North America*

CERTIFICATE OF SERVICE

I, Amy A. Pines, an attorney, hereby certify that on June 4, 2008, I caused a copy of the foregoing Respondents' Motion to Obtain Reciprocal Discovery to be filed electronically with the Clerk of the Court using the CM/ECF system, which will automatically send email notifications of such filing to the following attorneys: Peter V. Baugher and Lindsay Wilson Gowin of Schopf & Weiss LLP, One South Wacker Drive, 28th Floor, Chicago IL 60606.

By: /s/ Amy A. Pines

LEVENFELD PEARLSTEIN, LLC
2 N. LaSalle St., Suite 1300
Chicago, Illinois 60602
Phone: (312) 344-8380
Facsimile: (312) 346-8434
apines@lplegal.com

*Attorney for Respondents Lee Hillman,
Mark Minter, and Power Plate North America*